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June 26, 2023

VIA ECF

Hon. Denise Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

CC: All Counsel of Record, Via ECF

RE: Schottenstein, et al., v. Lee, et al.; Index #22-CV-1197 (VSB);
Request to Adjourn 6/28/2023 Mediation

Your Honor—

I represent Defendants Derek Lee and Pearl Chan in the above-referenced matter and write to respectfully request a one-month adjournment of the June 28, 2023, mediation. This is Defendants' second application for the requested relief, and it is made with consent of all counsel.

While the parties have now exchanged some 1500 pages of document discovery, additional materials remain outstanding from the Plaintiff, which counsel has assured Defendants will be produced forthwith. Meanwhile, there is consensus among the parties that it would be more productive to hold the mediation after the remaining paper discovery is complete, but before depositions have been held.

To that end, depositions for all parties can be scheduled following the completion of paper discovery, but well prior to the Court's August 18, 2023 deadline for the filing of summary judgment or a Joint Pre-trial Order. Accordingly, the parties respectfully request a one-month adjournment of the June 28, 2023 mediation, and thank the Court for its consideration of this request.

Regards,

Denise Cote
Denise Cote
6/27/23

/s/

Jeffrey Chabrowe, Esq.
Attorney(s) for Defendants
Derek Lee and Pearl Chan